

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	Honorable Jorge L. Alonso
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
Defendants.)	

**UNOPPOSED MOTION FOR LEAVE FOR PLAINTIFFS TO FILE AN
OVERSIZE BRIEF IN SUPPORT OF THEIR OMNIBUS MOTION
TO EXCLUDE THE TESTIMONY OF DEFENDANTS' EXPERTS
BRADFORD CORNELL, ALLEN FERRELL AND CHRISTOPHER JAMES**

Plaintiffs, through their attorneys, respectfully move the Court on an unopposed basis for leave to file a memorandum of law of 40 pages in length in support of Plaintiffs' Omnibus Motion to Exclude the Testimony of Defendants' Experts Bradford Cornell, Allen Ferrell and Christopher James. In support of this unopposed motion, Plaintiffs state as follows:

1. On February 9, 2016, this Court entered a pretrial schedule requiring that the parties' expert depositions be completed by March 9, 2016 and that any *Daubert* or other challenges arising out of expert discovery be raised with the Court by March 30, 2016 (Dkt. No. 2105 at 2) (the "Order").

2. Expert discovery has been completed.

3. On March 30, 2016, Plaintiffs intend to move to exclude the testimony of defendants' experts Bradford Cornell, Allen Ferrell and Christopher James on the grounds that: (i) the experts' testimony fails to satisfy the foundational requirements of reliability and relevance set forth in *Daubert* and Federal Rule of Evidence 702; (ii) the experts' testimony is improperly cumulative; and (iii) the experts failed to comply with their obligations under Federal Rules of Civil Procedure 26 and 30(d)(2). As Plaintiffs intend to address several of these issues in connection with more than one of defendants' experts, Plaintiffs believe it is most appropriate to raise all challenges to each of defendants' experts in a single, omnibus motion, rather than filing three separate 15-page memoranda to exclude each of defendants' experts.

4. Accordingly, Plaintiffs respectfully request leave to file an omnibus memorandum of law of up to 40 pages in length.

5. The parties have conferred and defendants have consented to this motion being filed as an unopposed motion, provided defendants are allowed 40 pages for their response.

WHEREFORE, Plaintiffs respectfully request that the Court grant this unopposed motion and allow the parties to each file a memorandum of law up to 40 pages in length.

DATED: March 24, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for counsel of record denoted on the attached Service List. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 24, 2016.

s/ Luke O. Brooks

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